

Local Rule 7.1(A)(2) Certification

Pursuant to Local Rule 7.1(A)(2), counsel for the Blockbuster states that given plaintiff's Motion to exclude Blockbuster's corporate representative from the deposition, no narrowing of the issues is possible.

Respectfully Submitted,

BLOCKBUSTER INC.

By its attorneys,

/s/ Jenny K. Cooper

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Dated: June 15, 2006

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of June, 2006, I caused a true copy of the above document to be served electronically on counsel of record registered with the Electronic Case Filing System (ECF).

/s/ Jenny K. Cooper

Jenny K. Cooper